

Application No.: 09/739,143
Amendment Dated: October 8, 2004
Reply to Office Action of July 8, 2004

MAT-8070US

Remarks/Arguments:

Claims 1-24 are pending and stand rejected.

By this Amendment, claims 1-24 are amended and new claim 25 is added.

Applicants contend that no new matter has been added by the claim amendments and new claim, and accordingly, entry and approval of same is respectfully requested. Support for the claim amendments and new claim is found throughout the specification, for example, at page 7, line 10 to page 9, line 4.

DRAWING OBJECTIONS

In the Action at item 6, the drawings were objected to as failing to comply with 37 CFR 1.84(p)(5) because numerical reference 2600 was mentioned on page 7, line 24 of the specification but was not shown in the drawings.

The specification has been amended to delete numerical reference 2600 in the specification.

Accordingly, the objection regarding numerical reference 2600 is now moot.

In the Action at item 7, the drawings were objected to as failing to comply with 37 CFR 1.84(p)(5) because numerical reference 1212 was shown in the drawings but not mentioned in the specification.

It is submitted that this objection has been overcome by the amendment to the specification at the paragraph beginning on page 13, line 16.

Reconsideration of these drawing objections is respectfully requested.

Application No.: 09/739,143
Amendment Dated: October 8, 2004
Reply to Office Action of July 8, 2004

MAT-8070US

SPECIFICATION OBJECTIONS

In the Action at item 8, the specification was objected to for informalities therein.

It is submitted that these objections have been overcome by the amendments to the specification.

Reconsideration of these specification objections is respectfully requested.

REJECTION UNDER 35 U.S.C. §101

In the Action at items 11 and 12, claims 1-16 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. In particular, the Examiner contends that "[e]very step is capable of performance by the human mind. A method of this sort, traditionally called a 'mental process', is not patentable subject matter." (See Action at item 12.)

Method claim 1 has been amended to include a "memory" and an outputting step. The method of claim 1 now clearly provides a useful result which is more than a "mental process" (i.e., to output the renewed structure image data).

Accordingly, it is submitted that method claim 1 overcomes the rejection under 35 U.S.C. §101.

Method claims 5, 7 and 8 have been amended similarly to method claim 1, and are submitted to also overcome the rejection for reasons similar to those of method claim 1.

Apparatus claim 9 has been amended to include an outputting unit to output the renewed structured image data (i.e., a useful result) and is submitted to overcome the rejection for similar reasons to those of method claim 1.

Further, apparatus claims 13, 15 and 16 have been amended similarly to apparatus claim 9 and are submitted to also overcome the rejection for reasons similar to those of apparatus claim 9.

Application No.: 09/739,143
Amendment Dated: October 8, 2004
Reply to Office Action of July 8, 2004

MAT-8070US

Claims 2-4, 6, 10-12 and 14 include the limitations of their respective base claims 1, 5, 9 and 13 from which they ultimately depend and are submitted to be free from this rejection for the same reasons as their respective base claims 1, 5, 9 and 13.

Reconsideration of the rejection to claims 1-16 under 35 U.S.C. §101 is respectfully requested.

REJECTION OF CLAIMS 1-4, 9-12 AND 17-20 UNDER 35 U.S.C. §103(a) AS OBVIOUS OVER LI, ET AL.

In the Action at items 14-22, claims 1-4, 9-12 and 17-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,345,279 to Li et al. (hereinafter referred to as Li).

Applicants respectfully traverse this rejection and request reconsideration.

Li Reference

In the Action at page 6, lines 6-8, the Examiner acknowledges that "Li fails to explicitly describe the positioning data of the structured image data items."

However, in the Action at page 6, lines 9-13, the Examiner contends that "Li discloses in Figure 3, the maintained position of structure image data items through the method processing as shown by the position of the image data items ..." (i.e., content items 120, InfoPyramids 280, and versions 374 of the InfoPyramids 280) in the multimedia document 100, a set 340 of InfoPyramids 280, and the customized multimedia document 370.

The Examiner seems to contend that, for example, the position of the content items 120, InfoPyramids 280, and versions 374 of the InfoPyramids 280 in the multimedia document 100 indicates positions data of such items in the multimedia document 100.

Applicants respectfully disagree that the position of the content items 120, InfoPyramids 280, and versions 374 of the InfoPyramids 280 in the multimedia document 100 indicates anything related to positions data of such items in the multimedia document 100.

Moreover, the Examiner is requested to closely review the positions of the image data items because these items are, in fact, not maintained throughout the method processing (see numerical references 100, 340 and 370 in Figure 3).

For example, in Fig. 3 of Li, the relative positions of the content items 120 within the multimedia document w 100 is not the same as the relative positions of InfoPyramids 280 within the customized document 370, and also is not the same as that of the versions 374 of the InfoPyramids 280 within the set 340. Furthermore, in Fig. 3 of Li, the positions of each of the content items 120 within the multimedia document w 100 is not the same as the positions of each of the versions 374 of the InfoPyramids 280 within the customized document 370. Moreover, the disclosure of Li is silent with regard to anything related to positioning or "positioning data" (as recited in claim 1).

Thus, it is submitted that Li does not disclose or suggest anything related to "positioning data" and, more particularly, to "replacing the positioning data and the document-image data before the processing with positioning data and document-image data after the processing" (as recited in claim 1. Moreover, the position of each of these structure image data items in Figure 3 is unrelated to "positioning data" of those structure image data items.

Independent Claim 1

Li fails to disclose or suggest each and every limitation of claim 1. Therefore, Applicants submit that claim 1 is patentable over Li and request that the rejection of claim 1 be withdrawn.

Independent Claims 9 And 17

Claims 9 and 17, while not identical to claim 1, include patentable features similar to claim 1 with regard to positioning data. Accordingly, claims 9 and 17 are also submitted to be patentable over Li for reasons similar to those set forth above.

Dependent Claims 2-4, 10-12 AND 18-20

Claims 2-4, 10-12 and 18-20 include the limitations of their respective base claims 1, 9 and 17 from which they ultimately depend, and are submitted to be free from the rejection under 35 U.S.C. §103(a) for the same reasons as their respective base claims 1, 9 and 17.

REJECTION OF CLAIMS 5-8, 13-16 AND 21-24 UNDER 35 U.S.C. §103(a) AS OBVIOUS OVER LI IN VIEW OF FIELDS, ET AL.

In the Action at items 23-30, claims 5-8, 13-16 and 21-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Li in view of U.S. Patent 6,606,120 to Fields et al. (hereinafter referred to as Fields).

Independent Claims 5, 7-8, 13, 15-16, 21 And 23-24

Claims 5, 7-8, 13, 15-16, 21 and 23-24, while not identical to claim 1, include patentable features similar to claim 1 with regard to the positioning data. Accordingly, claims 5, 7-8, 13, 15-16, 21 and 23-24 are also submitted to be patentable over Li for reasons similar to those set forth above regarding claim 1.

Fields Reference

It is submitted that the additional reference of Fields does not overcome the deficiencies of Li because Fields does not disclose or suggest "positioning data" and, more particularly, as an example the recitation in claim 1 of "renewing the structured image data by replacing the positioning data and the document-image data before the processing with positioning data and document-image data after the processing." This is because, for the recast web page of Fields height and width commands of the recast web page are included (see Fields at column 23, line 16 of the appendix) but positioning data is not included. Moreover, for the original web page of Fields, nothing is disclosed or suggested relating to either the height and width commands or the positioning data. Thus, Fields is silent regarding positioning data, in general, and, more particularly, Fields is silent regarding replacing the positioning data and the document-image data before the processing with positioning data and document-image data after the processing (as recited in claim 1).

Application No.: 09/739,143
Amendment Dated: October 8, 2004
Reply to Office Action of July 8, 2004

MAT-8070US

It is submitted that the cited art of Li and Fields taken singularly or in any proper combination, fail to disclose, or suggest the features of claims 5, 7-8, 13, 15-16, 21 and 23-24. Therefore, Applicants request that the rejection of claims 5, 7-8, 13, 15-16, 21 and 23-24 be withdrawn.

NEW CLAIM 25

New claim 25 recites "tree-structured data" which is not disclosed or suggested by the cited art.

Accordingly new claim 25 is submitted to be patentable for at least the above-mentioned reason.

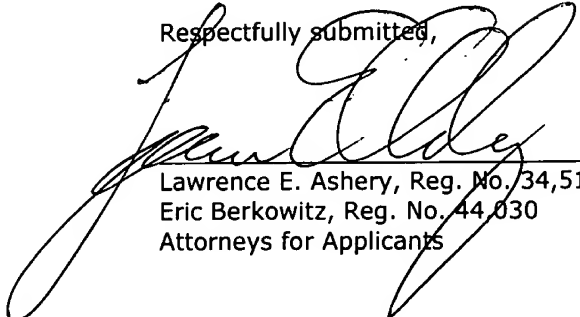
Application No.: 09/739,143
Amendment Dated: October 8, 2004
Reply to Office Action of July 8, 2004

MAT-8070US

CONCLUSION

In view of the amendments and arguments set forth above, the above-identified application is in condition for allowance, which action is respectfully requested.

Respectfully submitted,



Lawrence E. Ashery, Reg. No. 34,515
Eric Berkowitz, Reg. No. 44,030
Attorneys for Applicants

EB/dmw/ds

Dated: October 8, 2004

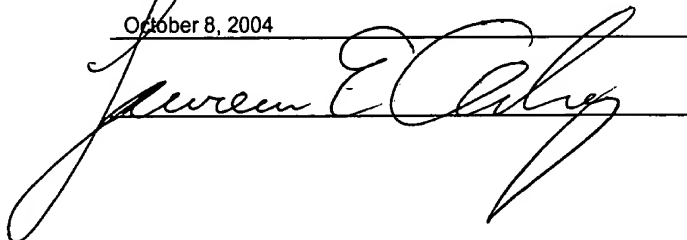
P.O. Box 980
Valley Forge, PA 19482
(610) 407-0700

The Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. 18-0350 of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:

October 8, 2004

EB_I:\MAT\8070US\AMENDMENT02-EB.DOC



Lawrence E. Ashery